

ENCLOSURE

NOTICE OF VIOLATION

Public Service Electric and Gas Company
Hope Creek Nuclear Generating Station

Docket No. 50-354
License No. NPF-57
EA 96-014

During an NRC inspection conducted between November 9, 1995 and December 21, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action" requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, as of December 15, 1995, the licensee did not establish measures to assure that conditions adverse to quality were promptly identified and corrected. Specifically, the licensee experienced a series of snubber failures over a period of three cycles as a result of failing to take appropriate corrective action to ameliorate high forces on the residual heat removal piping system that damaged the piping support system. During refueling outages in 1992 and 1994, the licensee found failures of the residual heat removal snubbers on the common suction line due to hydraulic overloads on the system. During the 1994 refueling outage the licensee determined several corrective actions which were necessary to ameliorate the high hydraulic loads. However, the corrective actions were not implemented. (01013)

This is a Severity Level III violation (Supplement I).

- B. 10 CFR 50.71(e) requires, in part, that each person licensed to operate a nuclear power reactor pursuant to the provisions of 50.21 or 50.22 of this part shall update periodically, as provided in paragraphs (e)(3) and (4) of this section, the final safety analysis report (FSAR) ... The updated FSAR shall be revised to include the effects of: all changes made in the facility or procedures as described in the FSAR; all safety evaluations performed by the licensee either in support of requested license amendments or in support of conclusions that changes did not involve an unreviewed safety question.

Contrary to the above, as of December 15, 1995, the licensee had not updated the FSAR periodically, as provided in paragraphs (e)(3) and (4) of 10 CFR 50.71. Specifically, the safety auxiliary cooling system which was originally designed to operate at a minimum temperature of 65 degrees F, was repeatedly operated for almost a decade at temperatures less than the prescribed minimum reflected in the FSAR. The licensee identified that they were operating outside of the FSAR. HCGS engineering performed an evaluation and found that operating at a temperature below that specified in the FSAR was acceptable. However, the licensee had not made the required changes to the FSAR. This was identified by the licensee during startup in 1986 and 1991. (01014)

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions to 10 CFR 2.201, Public Service Electric and Gas Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of the Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violation, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at King of Prussia, Pennsylvania
this 8th day of April 1996